

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,
Plaintiff

v.

ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY, and
CORRECTIONAL MEDICAL
SERVICES, INC.
Defendants

Civil Action No. 04-11935-DPW

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 7.2 of the United States District Court for the District of Massachusetts, Defendants Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County hereby seek leave to file the following pleadings under seal because the pleadings reveal grand jury proceedings that, by statute, must remain confidential and they contain references to, and attach copies of, documents that have been designated


"Confidential" pursuant to the terms of the Protective Order issued in this case:

1. Defendants Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County's Motion To Compel the Production of Testimony From the United States Attorney's Office; and
2. Memorandum in Support of Motion to Compel the Production of Testimony From the United States Attorney's Office.

The Defendants further request that the above pleadings remain impounded pending further order of the Court.

Respectfully submitted,
For the Defendants Andrea Cabral,
Suffolk County Sheriff's Department,

and Suffolk County
By their Attorney

A handwritten signature in cursive script, appearing to read "E M Caulo".

Ellen M. Caulo, BBO #545250
Deputy General Counsel
Suffolk County Sheriff's Department
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August 3, 2005